

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	
Barry J. Reed	)	Case No. 22-21132 JAD
	)	Chapter 7
Debtor	)	
	)	Related to Docket No. 25 - 26
	)	
Barry J. Reed	)	Hearing Date and Time:
	)	September 30, 2022 at 11:00 AM
Movant	)	
	)	
vs.	)	
	)	
Erin Capital Management LLC,	)	
	)	
Respondent	)	

**CERTIFICATE OF NO OBJECTION REGARDING MOTION TO AVOID JUDGMENT  
LIEN ENCUMBERING DEBTOR'S REAL PROPERTY PURSUANT 11 U.S.C § 522  
(f)(1)(A) and U.S.C § 522 (f)(2)(A)**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion to Avoid Judgment Lien filed on September 1, 2022 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion to Avoid Judgment Lien for Movant appears thereon. Pursuant to the Notice of Hearing, objections for Motion to Avoid Judgment Lien were to be filed and served no later than September 19, 2022.

It is hereby respectfully requested that the Order attached to the Motion to Avoid Judgment Lien be entered by the Court.

Respectfully submitted,

September 20, 2022  
Date:

/s/ Kenneth Steidl  
Kenneth Steidl, Esquire  
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